

1 **QUINN EMANUEL URQUHART & SULLIVAN, LLP**

2 Stephen A. Swedlow (admitted *pro hac vice*)

3 stephenswedlow@quinnemanuel.com

4 191 N. Wacker Drive, Suite 2700

5 Chicago, IL 60606

6 (312) 705-7400

7 **HAGENS BERMAN SOBOL SHAPIRO LLP**

8 Shana E. Scarlett (Bar No. 217895)

9 shanas@hbsslaw.com

10 715 Hearst Avenue, Suite 202

11 Berkeley, CA 94710

12 (510) 725-3000

13 *Interim Co-Lead Consumer Class Counsel*

14 **BATHAEE DUNNE LLP**

15 Yavar Bathaee (Bar No. 282388)

16 yavar@bathaeedunne.com

17 445 Park Avenue, 9th Floor

18 New York, NY 10022

19 (332) 205-7668

20 **SCOTT+SCOTT ATTORNEYS AT LAW LLP**

21 Kristen M. Anderson (Bar No. 246108)

22 kanderson@scott-scott.com

23 230 Park Avenue, 17th Floor

24 New York, NY 10169

25 (212) 233-6444

26 *Interim Co-Lead Advertiser Class Counsel*

27 SONAL N. MEHTA (SBN 222086)

28 Sonal.Mehta@wilmerhale.com

1 **WILMER CUTLER PICKERING**

2 **HALE AND DORR LLP**

3 950 Page Mill Road

4 Palo Alto, California 94303

5 Telephone: (650) 858-6000

6 Facsimile: (650) 858-6100

7 **DAVID Z. GRINGER (pro hac vice)**

8 David.Gringer@wilmerhale.com

9 **WILMER CUTLER PICKERING**

10 **HALE AND DORR LLP**

11 1875 Pennsylvania Ave NW

12 Washington, DC 20006

13 Telephone: (202) 663-6000

14 Facsimile: (202) 663-6363

15 *Attorneys for Defendant Facebook, Inc.*

16 **UNITED STATES DISTRICT COURT**

17 **NORTHERN DISTRICT OF CALIFORNIA**

18 **SAN JOSE DIVISION**

19 MAXIMILIAN KLEIN, et al., on behalf of

20 themselves and all others similarly situated,

21 Plaintiffs,

22 v.

23 FACEBOOK, INC., a Delaware Corporation

24 headquartered in California,

25 Defendant.

26 Case No. 5:20-cv-08570-LHK

27 **STIPULATION TO ENTER  
28 STIPULATED INTERIM  
PROTECTIVE ORDER**

1 Judge: Hon. Lucy H. Koh

1           Defendant Facebook, Inc. (“Facebook” or “Defendant”) and Plaintiffs Maximilian  
2 Klein, et al. (“Plaintiffs”), by and through their respective counsel, hereby stipulate as  
3 follows:

4           WHEREAS, the parties are currently negotiating a final protective order and have  
5 made substantial progress towards agreement on many provisions and narrowing their  
6 disputes on others.

7           WHEREAS, the parties have agreed to exchange final positions by May 7 and  
8 jointly submit any disputes to the Court in writing by May 14.

9           WHEREAS, per the Court’s April 2, 2021 Case Management Order (Dkt. 82),  
10 Defendant is making a production to Plaintiffs on Monday, May 3.

11           WHEREAS, to govern that production, the parties stipulate to entry of this interim  
12 protective order.

13           WHEREAS, this interim protective order is agreed to without prejudice to either  
14 party asking for different, additional, or fewer provisions in the final protective order, and  
15 the parties expressly acknowledge and stipulate that they will not rely on the provisions of  
16 the interim protective order or their compromise on the interim order in support of their  
17 respective arguments or proposals as to the terms that should govern the final protective  
18 order in this matter.

19           WHEREAS, the parties hereby stipulate that this interim protective order shall  
20 expire as soon as the final protective order is entered.

21           WHEREAS, the parties jointly and respectfully request that the Court enter the  
22 parties’ Proposed Interim Stipulated Protective Order submitted herewith.

23  
24  
25  
26  
27  
28

1 Dated: April 30, 2021  
2

3 By /s/ Shana E. Scarlett  
4

5 **HAGENS BERMAN SOBOL SHAPIRO LLP**  
6 Shana E. Scarlett (Bar No. 217895)  
7 shanas@hbsslaw.com  
8 715 Hearst Avenue, Suite 202  
9 Berkeley, CA 94710  
(510) 725-3000

10 Steve W. Berman (admitted *pro hac vice*)  
11 steve@hbsslaw.com  
12 1301 Second Avenue, Suite 2000  
13 Seattle, WA 98101  
(206) 623-7292

14 **LOCKRIDGE GRINDAL NAUEN P.L.L.P.**

15 W. Joseph Bruckner (admitted *pro hac vice*)  
16 wjbruckner@locklaw.com  
17 Robert K. Shelquist (admitted *pro hac vice*)  
18 rkshelquist@locklaw.com  
19 Brian D. Clark (admitted *pro hac vice*)  
20 bdclark@locklaw.com  
21 Rebecca A. Peterson (Bar No. 241858)  
22 rapeterson@locklaw.com  
23 Arielle S. Wagner (admitted *pro hac vice*)  
24 aswagner@locklaw.com  
25 Stephanie A. Chen (admitted *pro hac vice*)  
26 sachen@locklaw.com  
27 100 Washington Avenue South, Suite 2200  
28 Minneapolis, MN 55401  
(612) 339-6900

1 By /s/ Stephen A. Swedlow  
2

3 **QUINN EMANUEL URQUHART & SULLIVAN,  
4 LLP**  
5 Stephen A. Swedlow (admitted *pro hac vice*)  
6 stephenswedlow@quinnmanuel.com  
7 Michelle Schmit  
8 michelleschmit@quinnmanuel.com  
9 191 N. Wacker Drive, Suite 2700  
10 Chicago, IL 60606-1881  
(312) 705-7400

11 Manisha M. Sheth (admitted *pro hac vice*)  
12 manishasheth@quinnmanuel.com  
13 51 Madison Avenue, 22nd Floor  
14 New York, New York 10010  
(212) 849-7000

15 Kevin Y. Teruya (Bar No. 235916)  
16 kevinteruya@quinnmanuel.com  
17 Adam B. Wolfson (Bar No. 262125)  
18 adamwolfson@quinnmanuel.com  
19 Brantley I. Pepperman (Bar No. 322057)  
20 brantleypepperman@quinnmanuel.com  
21 865 South Figueroa Street, 10th Floor  
22 Los Angeles, CA 90017-2543  
(213) 443-3000

23 **KELLER LENKNER LLC**

24 Warren Postman (Bar No. 330869)  
25 wdp@kellerlenkner.com  
26 Jason Ethridge (admitted *pro hac vice*)  
27 jason.ethridge@kellerlenkner.com  
28 1300 I Street, N.W., Suite 400E  
Washington, DC 20005  
(202) 918-1123

1 Ashley Keller (admitted *pro hac vice*)  
2 ack@kellerlenkner.com  
3 Ben Whiting (admitted *pro hac vice*)  
4 ben.whiting@kellerlenkner.com  
5 Jason A. Zweig (admitted *pro hac vice*)  
6 jaz@kellerlenkner.com  
7 150 N. Riverside Plaza, Suite 4270  
8 Chicago, IL 60606  
(312) 741-5220

29 *Interim Counsel for the Consumer Class*

1 By /s/ Kristen M. Anderson

2 **SCOTT+SCOTT ATTORNEYS AT LAW LLP**

3 Kristen M. Anderson (CA 246108)

4 The Helmsley Building  
230 Park Avenue, 17th Floor  
New York, NY 10169  
Telephone: 212-233-6444  
Facsimile: 212-233-6334  
kanderson@scott-scott.com

5 Christopher M. Burke (CA 214799)

6 David H. Goldberger (CA 225869)

7 Yifan (Kate) Lv (CA 302704)

8 600 W. Broadway, Suite 3300

9 San Diego, CA 92101

10 Telephone: 619-233-4565

11 Facsimile: 619-233-0508

12 cburke@scott-scott.com

13 dgoldberger@scott-scott.com

14 klv@scott-scott.com

15 Patrick J. McGahan (*pro hac vice*)

16 Michael P. Srodoski (*pro hac vice*)

17 156 South Main Street, P.O. Box 192

18 Colchester, CT 06415

19 Telephone: 860-537-5537

20 Facsimile: 860-537-4432

21 pmcgahan@scott-scott.com

22 msrodoski@scott-scott.com

23 **LEVIN SEDRAN & BERMAN LLP**

24 Keith J. Verrier (*pro hac vice*)

25 Austin B. Cohen (*pro hac vice*)

26 510 Walnut Street, Suite 500

27 Philadelphia, PA 19106-3997

28 Telephone: 215-592-1500

Facsimile: 215-592-4663

kverrier@lfsblaw.com

acohen@lfsblaw.com

1 By /s/ Brian Dunne

2 **BATHAEE DUNNE LLP**

3 Yavar Bathaee (CA 282388)

4 Edward M. Grauman (*pro hac vice*)

5 Andrew C. Wolinsky (*pro hac vice*)

6 445 Park Avenue, 9th Floor

7 New York, NY 10022

8 Telephone: 332-205-7668

9 yavar@bathaeedunne.com

10 egrauman@bathaeedunne.com

11 awolinsky@bathaeedunne.com

12 Brian J. Dunne (CA 275689)

13 633 West Fifth Street, 26th Floor

14 Los Angeles, CA 90071

15 Telephone: 213-462-2772

16 bdunne@bathaeedunne.com

17 **AHDOOT & WOLFSON, PC**

18 Tina Wolfson (CA 174806)

19 Robert Ahdoot (CA 172098)

20 Theodore W. Maya (CA 223242)

21 Rachel Johnson (CA 331351)

22 2600 West Olive Avenue, Suite 500

23 Burbank, CA 91505

24 Telephone: 310-474-9111

25 Facsimile: 310-474-8585

26 twolfson@ahdootwolfson.com

27 rahdoot@ahdootwolfson.com

28 tmaya@ahdootwolfson.com

29 rjohnson@ahdootwolfson.com

30 *Interim Counsel for the Advertiser Class*

1 By: /s/ Sonal N. Mehta

2 SONAL N. MEHTA (SBN 222086)  
3 Sonal.Mehta@wilmerhale.com  
4 **WILMER CUTLER PICKERING**  
5 **HALE AND DORR LLP**  
6 950 Page Mill Road  
Palo Alto, California 94303  
Telephone: (650) 858-6000  
Facsimile: (650) 858-6100

7 DAVID Z. GRINGER (*pro hac vice*)  
8 David.Gringer@wilmerhale.com  
9 **WILMER CUTLER PICKERING**  
10 **HALE AND DORR LLP**  
11 1875 Pennsylvania Ave NW  
Washington, DC 20006  
Telephone: (202) 663-6000  
Facsimile: (202) 663-6363

12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

## **SIGNATURE ATTESTATION**

I am the ECF User whose identification and password are being used to file the foregoing. Pursuant to Civil Local Rule 5-1(i), I hereby attest that the other signatories have concurred in this filing.

Dated: April 30, 2021

By: /s/ Sonal N. Mehta  
Sonal N. Mehta